



A TRADITION OF LEGAL EXCELLENCE SINCE 1938

Connell Foley LLP  
888 Seventh Avenue  
9th Floor  
New York, NY 10106  
P 212.307.3700 F 212.262.0050

Michael Bojbasa  
Of Counsel  
MBOJBASA@CONNELLFOLEY.COM

August 9, 2018

**VIA ECF**

Magistrate Judge Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:** Janine Linton v. Frontier Airlines, Inc.  
Index No.: 18 CV 00044  
CF File: 16489/122476

Dear Judge Tiscione:

We represent the Defendant in the referenced action and write on behalf of both parties. The parties apologize for failing to file this status report by the August 1<sup>st</sup> deadline.

Defendant served its initial discovery demands on June 18, 2018 and received responses to the First Set of Interrogatories on July 20<sup>th</sup>. However, Plaintiff's responses to the interrogatories were not verified by Plaintiff pursuant to Rule 33 of the FRCP. Defendant has not received responses to the Second Set of Interrogatories, which addressed the identification of Plaintiff's expert witnesses, and Defendant's Request for Production of Documents. Both of these demands were previously served on June 18<sup>th</sup> as well.

Defendant sent a letter to Plaintiff's counsel on August 3<sup>rd</sup>, requesting the overdue discovery as set forth above. In addition, by said letter Defendant has also requested authorizations for additional medical providers Plaintiff has treated with, Plaintiff's employers, and Plaintiff's tax returns (as lost wages are being claimed). Defendant has requested that the aforementioned discovery be provided by August 17, so that the parties can proceed to schedule depositions.

Roseland

Jersey City

Newark

New York

Cherry Hill

Philadelphia

[www.connellfoley.com](http://www.connellfoley.com)

August 9, 2018  
Page 2

Plaintiff served interrogatories and a request for the production of documents on July 18<sup>th</sup>. Defendant is working on providing timely responses to said demands which are due on August 20<sup>th</sup>.

Respectfully,



Michael Bojbasa

MB/dzc

cc: VIA ECF  
Janai Jackson, Esq.  
Jackson Legal Group, P.C.  
807 Kings Highway - 2nd Floor  
Brooklyn, New York 11223